

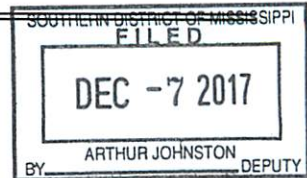
Pro Se 5 (Rev. 12/16) Complaint for a Civil Case Alleging Negligence

## UNITED STATES DISTRICT COURT

for the

District of

Division



Case No.

3:17cv00972-CWR-FKB

(to be filled in by the Clerk's Office)

Kimberly Edwards

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) ☒ Yes ☐ No

Jackson Hinds Comprehensive Health Center

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

**COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE**  
(28 U.S.C. § 1332; Diversity of Citizenship)

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Kimberly Edwards
Street Address	184 Kings Drive
City and County	Pickens, Holmes
State and Zip Code	Ms, 39146
Telephone Number	662-468-0937
E-mail Address	rebelkimber@gmail.com

1 P.O. Box 312

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	Jackson Hinds Comprehensive Health Center
Job or Title <i>(if known)</i>	Clinic
Street Address	350W Woodrow Wilson Street
City and County	Jackson
State and Zip Code	Ms, 39213
Telephone Number	601-362-5321
E-mail Address <i>(if known)</i>	

**Defendant No. 2**

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**Defendant No. 3**

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**Defendant No. 4**

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

**A. The Plaintiff(s)**

1. If the plaintiff is an individual

The plaintiff, *(name)* , is a citizen of the  
State of *(name)* .

2. If the plaintiff is a corporation

The plaintiff, *(name)* Kimberly Edwards , is incorporated  
under the laws of the State of *(name)* Mississippi ,  
and has its principal place of business in the State of *(name)* .

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**B. The Defendant(s)**

1. If the defendant is an individual

The defendant, *(name)* , is a citizen of  
the State of *(name)* . Or is a citizen of  
*(foreign nation)* .

2. If the defendant is a corporation

The defendant, *(name)* Jackson Hind comprehensive Center , is incorporated under  
the laws of the State of *(name)* , and has its  
principal place of business in the State of *(name)* .  
Or is incorporated under the laws of *(foreign nation)* ,  
and has its principal place of business in *(name)* .

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

**C. The Amount in Controversy**

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

3,000,000.00

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On *(date)* 03/01/2017 , at *(place)* Jackson -Hinds Comprehensive Center ,

the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because *(describe the acts or failures to act and why they were negligent)*

Put false information on my records , drew blood and the needles popped off in both my arms ,withheld information

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by *(explain)*

Some fo the information was false, like the numbers on the lab results . The lady in the lab was trying to draw blood from both arms and dint know what she was doing and the needles broke off in my arm causing more poor circulation and heart problems and more anemia and blood poisoning.

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Heart , kidney Liver problems , Anemia have worsened because of the false information on lab work and evidence that has been held back. and circulation and heart problems have worsen because of the needles she broke off into each arm. \$ 227,000,000.00

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/05/2017

Signature of Plaintiff   
Printed Name of Plaintiff

**B. For Attorneys**

Date of signing:

Signature of Attorney  
Printed Name of Attorney  
Bar Number  
Name of Law Firm  
Street Address  
State and Zip Code  
Telephone Number  
E-mail Address